

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

CHERYL GORDON, an individual,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. : CV-_____
)	
KAMERON PATTON, an individual;)	
and PROGRESSIVE CASUALTY)	
INSURANCE COMPANY)	
)	
Defendants.)	

COMPLAINT

Cheryl Gordon, for his Complaint against defendant Kameron Patton, states and alleges as follows:

JURISDICTION

1. This court has diversity jurisdiction under 28 USC §1332. Plaintiff Cheryl Gordon is an adult resident citizen of Alabama. Defendant Kameron Patton is an adult resident citizen of Georgia. Defendant Progressive Casualty Insurance Company is headquartered in Ohio. Accordingly, this action is between citizens of different states.

2. The amount in controversy in this matter exceeds \$75,000.00, exclusive of interest and costs.

VENUE

3. Venue is proper under 28 USC § 1402(b) because Plaintiff's claim against Progressive Casualty Insurance Company arises out of a contract formed in this venue. The Court has pendant jurisdiction over claims asserted against Kameron Patton.

CLAIM FOR RELIEF

4. On October 10, 2015, Kameron Patton negligently and/or wantonly caused the vehicle he was driving to collide into a vehicle being occupied by the Plaintiff.

5. This collision proximately caused the Plaintiff to suffer serious injury, including but not limited to neck and back injuries,

6. At the time of the wreck, Plaintiff was the beneficiary of a policy of insurance issued by Defendant Progressive Casualty Insurance Company. That policy included uninsured motorist coverage. To the extent that Plaintiff's damages exceed the bodily injury liability policy limit of Kameron Patton's policy, Progressive Casualty Insurance Company is liable to the Plaintiff to pay the bodily injury damages she suffered in this wreck.

WHEREFORE, Plaintiff respectfully prays for judgment against Defendants for all damages authorized by law

s/ Mark Erdberg
Mark Erdberg
Attorney for Plaintiff

OF COUNSEL:

Jaffe & Erdberg
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PLEASE SERVE DEFENDANT BY CERTIFIED MAIL

Kameron Patton
1454 Brookline Court SE
Mableton, Georgia 30126

Progressive Casualty Insurance Company
c/o CT Corporation System
2 North Jackson Street, Suite 606
Montgomery, Alabama 36104